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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 JOSHUA A. MARTINEZ,

14 Defendant.
15

Case No. 2:21-cr-00219-APG-DJA

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**

16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel
17 Schiess, Assistant United States Attorney, counsel for the United States of
18 America, and Joanne L. Diamond, Assistant Federal Public Defender, counsel for
19 Joshua Martinez, that the Court modify his conditions of release.

20 The Stipulation is entered into for the following reasons:

21 1. On September 10, 2021, the Court ordered Mr. Martinez's release on
22 a personal recognizance bond with certain conditions, including (1) a requirement
23 to submit to a mental health evaluation, and participate in mental health
24 treatment, as directed by pretrial services, ECF No. 13 at 4; and (2) a travel
25 restriction allowing him to travel only within a six-mile radius of his home for the
26 purposes that he is allowed out of his residence, ECF No. 13 at 6.

2. This Court previously approved the parties' stipulation allowing Mr. Martinez to attend appointments with a mental health provider in Overton, Nevada, which is outside the six-mile approved radius of travel from his home. ECF No. 21. That mental health provider recently left the area. Mr. Martinez has found a new provider in Mesquite, Nevada, which is also outside the six-mile approved radius of travel.

3. Mr. Martinez therefore moves the Court to modify his bond conditions to permit him to travel to Mesquite, Nevada, with the prior permission of Pretrial Services.

4. Counsel has spoken with Pretrial Services concerning this issue. Pretrial Services support the requested modification.

5. The government has no objection to the requested modification.

DATED: February 27, 2023.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ Joanne L. Diamond
By _____
JOANNE L. DIAMOND
Assistant Federal Public Defender

/s/ Daniel Schiess
By _____
DANIEL SCHIESS
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3
4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 JOSHUA A. MARTINEZ,

8 Defendant.
9

Case No. 2:21-cr-00219-APG-DJA

ORDER

10 IT IS THEREFORE ORDERED that Mr. Martinez's conditions of release
11 be modified to allow him to travel to Mesquite, Nevada, with the prior permission
12 of Pretrial Services.

13 DATED March 1, 2023

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15 UNITED STATES MAGISTRATE JUDGE
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